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MAY 10 1998

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

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Selected Issues Regarding the Forward-Looking

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Economic Cost Mechanism for Universal

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Service Support

)

CC Docket Nos. 96-45, 97-160

UNITED STATES TELEPHONE ASSOCIATION
PETITION FOR EXTENSION OF TIME

The United States Telephone Association (USTA) respectfully submits a Petition for Extension of Time to file comments in the above-referenced proceeding. USTA is the principal trade association of the local exchange carrier (LEC) industry. Its members provide over 95 percent of the incumbent LEC-provided access lines in the U.S. USTA's nonrural carrier members are subject to the Commission's determination that federal universal service high cost support should be based on forward-looking economic cost.

On May 4, the Common Carrier Bureau released a Public Notice requesting new information and detailed comments on the appropriate input values for the forward-looking economic cost mechanism and the level of the revenue benchmark for nonrural carriers. Comments were requested on May 26 and reply comments by June 9. USTA requests that the Bureau extend the comment date to June 26, 1998 and the reply comment date to July 23, 1998.

USTA notes that the Common Carrier Bureau has also released a Public Notice requesting comment by May 15 and reply comments by May 29 on new proposals filed on April 27 to revise the methodology for determining universal service support. One of the issues which

is before the Bureau in those comments is whether a revenue benchmark or a cost benchmark should be adopted. In addition, the Bureau has requested comment on May 26 and reply comments on June 10 on proposals to monitor universal service. These overlapping and simultaneous comment cycles, particularly during a holiday, put a severe strain on resources since in the majority of companies the same personnel are responsible for responding to all of these proceedings. To the extent that the Bureau is considering new proposals to determine universal service support, filing comments on the level of the revenue benchmark or on certain input values may be premature.

In addition, the Bureau has not yet adopted the model platform design for which the input values will be utilized. Both the HAI and BCPM models contain hundreds of inputs on which the Bureau has requested comment. The Bureau is well aware of the importance of the input values because the inputs determine the amount of universal service support which will be available to nonrural carriers. For example, the difference between the low end estimate using the HAI default inputs and the high end estimates using the BCPM default inputs is about six billion dollars. The Telecommunications Act of 1996 requires that universal service be "sufficient". Any differences between the output of the cost proxy model and the actual cost of providing universal service will impact the maintenance of affordable, high quality universal service.

USTA's nonrural carriers must have sufficient time to provide their comments on these inputs. Three weeks is not enough time to update data as necessary and to analyze the inputs in order to develop comments. The public interest is best served by providing all parties adequate time to comment on the inputs to the platform models. Therefore, USTA requests that the

Commission extend the time for filing comments to June 26, 1998 and the time for filing reply comments to July 23, 1998.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

By: 

Its Attorneys:

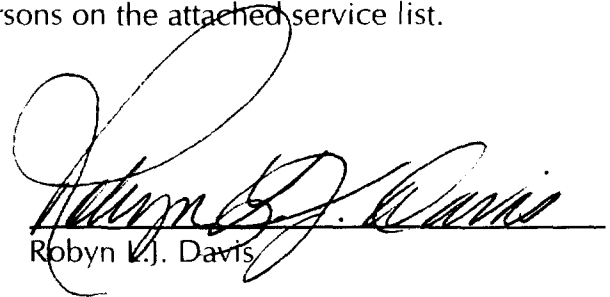
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May 19, 1998

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on May 19, 1998 Petition for Extension of Time of the United States Telephone Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


Robyn L.J. Davis